

**EXHIBIT "A"****RICO STATEMENT****QUESTION # 2**

<b>DEFENDANT</b>	<b>MISCONDUCT</b>	<b>BASIS OF LIABILITY</b>
Samir Salah	<p>Samir I. Salah is the Egyptian-born director of the Virginia mosque where two of the September 11 hijackers worshipped, a former director and treasurer of a notorious terror-financing bank, the treasurer for a charity whose Bosnia branch has been designated by the Treasury Department as a Specially Designated Global Terrorist ("SDGT") based on evidence that it funneled money to al Qaida, and an integral member of the SAAR Foundation, whose Virginia offices were among those that the FBI and U.S. Customs officials raided in March 2002 and from which these law enforcement branches seized records which are reported to have revealed a pattern of multi-layered transactions that were designed to confuse law-enforcement authorities and keep them off the money trail.</p> <p><b>SAAR Network:</b> The SAAR Network is a group of Muslim charities, think tanks and related companies, the vast majority of which shared a common address at 555 Grove Street, Herndon, Virginia. The Network's name is derived from the initials of defendant Suleiman Abdul Aziz al Rajhi, who was involved in establishing and funding many of them. The entities comprising the SAAR Network are linked by overlapping boards of directors, shared offices and the circular movement of money, according to tax forms and federal investigators. Indeed, Salah is an trusted officer of multiple entities in the SAAR Network.</p> <p>On March 20 and 21, 2002, federal authorities raided the offices of the SAAR Network entities, the vast majority of which were located at a single address in Herndon, Virginia, as well as the residences of several prominent SAAR Network officials, pursuant to a search warrant issued by the United States District Court for the Eastern District of Virginia. The ongoing investigation of the SAAR network entities, which prompted the March 2002 searches, has revealed that SAAR entities' funds have been transferred to Youssef Nada and Ahmed Idris Nasreddin, both of whom have been designated under Executive Order</p>	1962(a), 1962(c), 1962(d)

13224 based on their material support and sponsorship of al Qaida. The funds were transferred through Bank al-Taqwa and Akida Bank Private Ltd., the former of which was a Bank whose board Salah sat on. Both of those banks have been designated by the U.S. government pursuant to Executive Order 13224, based on their involvement in financing radical groups throughout the world, including Hamas and al Qaeda, both before and after the September 11th attack.

Samir Salah is an officer of the SAAR Foundation, whose Virginia offices were among those that the FBI and U.S. Custom's officials raided in March 2002. Of \$54 million dollars raised by the SAAR Foundation ostensibly for "charity," reports suggest \$26 million went to the Isle of Man in the Irish Sea, a notorious location for drug runners and money laundering. Only \$20 million made its way to SAAR Network charities. According to David Kane, the federal agent who led the raid, SAAR's intent was "to route money through hidden paths to terrorists, and to defraud the United States by impeding, importing, obstructing, and defeating the lawful functions of the IRS."

In addition, Salah is a founder and board member of Safa Trust, another one of the SAAR Network entities targeted by the FBI raid. Other co-officers of Safa Trust are defendants Jamal Barzinji, Yaqub Mirza, Ahmed Totonji, and Hisham al Talib, which are all also represented by the same counsel in this litigation. Safa Trust shares the same address as the following entities that are or have been defendants in this litigation, African Muslim Agency, Grove Corporate, Mar-Jac Investments, Mena Corporation, Muslim World League, Reston Investments, Saar Foundation, Sanabel al Kheer, Sana-Bell, Inc., Sterling Management Group, and York Foundation.

Salah is also an officer of Mar-Jac Investments. Other co-officers of Mar-Jac Investments along with defendant Salah are defendants Yaqub Mirza and M. Omar Ashraf, who are also represented by the same counsel. Mar-Jac Investments shares the same address as the following entities that have been defendants in this litigation, African Muslim Agency, Grove Corporate, Mena Corporation, Muslim World League, Reston Investments, Saar Foundation, Safa Trust, Sanabel al Kheer, Sana-Bell, Inc., Sterling Management Group, and York Foundation.

Salah has also been a board member of Amana Mutual Funds with, among others, Iqbal Unus, Jamal Barzinji, and

Yaqub Mirza. Amana is a growth and income mutual fund headquartered in Bellingham, Wash., conveniently near the Canadian border. Mirza served as Vice President and then President of the SAAR Foundation from 1984-2000. In August 2000, Mirza registered the Defendant MWL in Virginia. The MWL and its offshoot organization, the IIRO, both provide substantial financial assistance to Al-Qaeda. Additionally, Mirza was a founding trustee of Sana-Bell, Inc. Sana-Bell is closely affiliated with both the MWL and the IIRO and is suspected of providing financial assistance to Al-Qaeda in the 1998 Embassy bombings

Salah has additional ties to the SAAR Foundation as president of Piedmont Trading Corporation and as CFO of Piedmont Poultry.

**Bank Al-Taqwa:** Salah served as a director and treasurer of Bank Al Taqwa (Arabic for “fear of God”), helping to form and manage the Bahamas branch of the Muslim Brotherhood’s al-Taqwa Group, a network of banks and shell corporations which is among those entities designated by OFAC as an Specially Designated Global Terrorist on November 7, 2001. Following that designation, Al-Taqwa’s assets were frozen, and al-Taqwa’s headquarters, two of its satellite offices and a few of its executives’ residences were raided as part of an international investigation into the bank’s relationship with Osama bin Laden and al-Qaeda. According to various White House and Treasury statements at the time of its designation, Bank al Taqwa has provided investment advice and cash transfer mechanisms for al-Qaida and other radical Islamic groups over the years, with offices in Switzerland, Lichtenstein, Italy and the Caribbean.

The Bank was established in 1988 with significant backing from the Muslim Brotherhood. It has been involved in financing radical groups such as the Palestinian Hamas, Algeria’s Islamic Salvation Front and Armed Islamic Group, Tanzania’s On-Nahda, and Osama Bin Laden and his al Qaida organization.

As of October 2000, Bank Al Taqwa appeared to be providing a clandestine line of credit to a close associate of Osama bin Laden. Indeed, other Al Taqwa officials – Youssef Nada, Ahmed Idris Nasreddin, Ali Ghaleb Himmat, and Albert Friedrich Armand Huber – were themselves marked with SDGT status in 2001 and 2002, and Nada has openly admitted that he knew as early as 1995 that Al-Taqwa Bank might be financing the activities

of terrorist outfits.

According to Italy's Division of General Intelligence and Special Operations, al-Taqwa handled financing for a number of Arab and Islamic political and militant groups, including former Afghan mujahedin in Bin Laden's camps, the Palestine Liberation Organization, Hamas, the Algerian Armed Islamic Group and the Egyptian Gama'a al-Islamiya. In March of 2001, the Bahamian government revoked Al Taqwa's banking license.

Testifying before Congress in February 2002, Juan Zarate of the Department of the Treasury told lawmakers that U.S. intelligence agencies had evidence that al-Qaeda operatives received financial assistance from Al-Taqwa's chairman as recently as late September 2001—after the 9/11 attacks. Al-Taqwa Bank has an account for Mamdouh Mahmoud Salim, an al-Qaeda operative who is in U.S. custody for his role in the 1998 Embassy bombings. U.S. investigators believe that the account has been used to finance terrorist activity.

According to an article in Newsweek, Al-Taqwa's Bahamian banking license allowed Al Taqwa officers to “open commercial correspondent accounts with established European banks —paying the larger institutions fees to make cash transfers around the world for them, without calling attention to themselves.” According to counterterrorism experts and government officials, such convoluted banking practices are a red flag for money laundering and terrorist financing.

Moreover, Al-Taqwa Bank has a close relationship with another organization owned by Nada: Al-Taqwa Management Company (eventually renamed Nada Management Company). Al Taqwa Bank relied heavily on Al-Taqwa Management Organization to conduct audits and feasibility studies concerning the bank. As a result, Al Taqwa Bank often transferred large sums of money to Al Taqwa Management Organization. Furthermore, Al Taqwa Bank often transferred money throughout Nada and Nasreddin's many other corporations and investments as well as into various Islamic charities. According to U.S. authorities, the bank's convoluted structure—“made it easy to use as a money laundering mechanism.” U.S. officials have stated that they believe the SAAR network entities have transferred a “total of about \$20 million to offshore accounts, much of it through Bank al Taqwa and Akida

	<p>Bank to Nada and Nasreddin firms.”</p> <p>Al-Taqwa’s vice president, Ali Ghaled Himmat, was labeled as a SDGT by President Bush on November 7, 2001. Authorities in Switzerland have a video cassette showing Himmat in Afghanistan, in March of 1993, in close proximity to Al Qaida training camps and participating in the making of speeches calling for the use of violence against the United States. Himmat is a member of the Syrian chapter of the Muslim Brotherhood.</p> <p><b>Taibah International Aid Association:</b> Salah has been the treasurer for Taibah International Aid Association, whose Bosnia branch has been designated by the U.S. Office of Foreign Asset Control (“OFAC”) as a Specially Designated Global Terrorist based on evidence that Taibah funneled money to al Qaida. Taibah has been the subject of terrorism investigations dating back to 1997, and its branch in Bosnia has been raided twice by the Bosnian government since Sept. 11 because of accusations of terrorist connections.</p> <p>In 2001, one month after the Sept. 11 attacks in the United States, Taibah’s Bosnia office was raided in connection with a terrorist plot to blow up the U.S. Embassy there. It turned out at least one of the six men arrested in the scheme worked for Taibah. In 2002, Taibah was identified by investigators in Bosnia as “under the direction of” the Muslim Brotherhood, one of the oldest Islamic terrorist groups in the world. Both U.S. and Bosnian officials determined Taibah worked hand-in-hand in Bosnia with another Islamic charity, Global Relief Foundation in Bridgeview, Ill., which the United States also named a Specially Designated Global Terrorist in October 2002. According to the U.S. Treasury Department, Global Relief’s Arabic newsletter regularly sought donations for armed Islamic jihad, including one solicitation for money “for equipping the raiders, for the purchase of ammunition and food, and for their (the Mujahideen’s) transportation so that they can raise God the Almighty’s word.”</p> <p>The relationship between Taibah and Global Relief was so close that Taibah stepped in to represent Global Relief’s interests in Bosnia after the government there shut down Global Relief for supporting terrorists, FBI records show.</p> <p>In 1997, Taibah’s dealings with the Saudi charity International Relief Organization were scrutinized as part of a federal terrorism, money laundering and fraud probe in Illinois and Virginia, according to testimony before</p>	
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	<p>Congress by Matthew Epstein of the Investigative Project. Both charities operated out of the same address at 360 South Washington Street in Falls Church, Va. Records show the International Relief Organization, which is the U.S.-based arm of the International Islamic Relief Organization, or IIRO, transferred thousands of dollars to another charity called Holy Land Foundation for Relief and Development, which the U.S. government shut down in December 2001 for aiding terrorists.</p> <p><b>Dar al-Hijrah:</b> Samir Salah is the founder and a former president of the Dar al-Hijrah, a mosque in Falls Church, Va., which has been both a platform for radical Islamic rhetoric and a magnet for militants. Two of the Sept. 11 hijackers, Nawaf Alhazmi and Hani Hanjour, attended Dar al-Hijrah in March 2001 prior to commandeering United Flight 77 and crashing it into the Pentagon.</p> <p>As the foregoing demonstrates, Samir Salah has held senior management positions in numerous organizations and business that have served as conduits and fronts for channeling material support and resources to al Qaida and affiliated terrorist organizations. By virtue of the senior positions he has held in all of these organizations, there can be no dispute that Salah was aware of their illicit activities, and in fact was responsible for directing many of those activities. Indeed, Salah's continuous and repeated association with organizations established for the purpose of channeling financial and logistical support to al Qaida demonstrates that he has played a central and knowing role in the Enterprise, and is an important architect of al Qaida's financial infrastructure. Through the organizations he managed and directed, Salah personally devised and executed a variety of schemes to finance and otherwise support the Enterprise, both within the United States and internationally.</p> <p>Through his actions in furtherance of the Enterprise's goals, Samir Salah agreed to actively participate in the conspiracy which led to the September 11 attack, and materially aided and abetted al Qaida in relation to the Attack.</p>	
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